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ECF filed: 3/12/20

Attorney for Reno Patio and
Fireplaces, LLC a Nevada
Limited liability company,
Et al

7 UNITED STATES BANKRUPTCY COURT
8 DISTRICT OF NEVADA
o0o

9 IN RE

BK-N-20-50017-BTB

10 AFFORDABLE PATIOS & SUNROOMS
11 dba RENO PATIO AND FIREPLACES,
12 Debtor(s).

CHAPTER 7

Adv. No. 20-05004

13 _____/
CHRISTOPHER P. BURKE, CHAPTER
SEVEN TRUSTEE

14 Plaintiff,

15 vs.

16 AFFORDABLE PATIOS & SUNROOMS
17 dba RENO PATIO AND FIREPLACES a
18 Nevada Corporation, RENO PATIO AND
19 FIREPLACES, LLC a Nevada limited
20 liability company,
21 MILL STREET AUTO, a fictitious
22 business entity
23 Of RENO PATIO AND FIREPLACES
24 LLC, and RICHARD TAYLOR, an
25 individual

26 Defendants,
27 _____/
28

**DECLARATION OF JOHN WOODLEY IN SUPPORT OF RESPONSE TO MOTION TO SELL
REAL PROPERTY FREE AND CLEAR OF LIENS**

24 I, John Woodley, hereby declare and state under penalty of perjury under the laws of the State of
25 Nevada, and the United States, as follows;

- 26
27 1. I am a resident of the state of Washington. I am the sole manager of Reno Patio & Fireplaces LLC
28

1 (hereafter LLC).

2 2. I am also the beneficiary of a trust, which owns 50% of the LLC. I have a business background and
3 have been involved in the liquation of multiple companies.

4 3. Until February 2020, Mill Street Auto operated a retail auto sales business at 690 Sunshine Lane,
5 Reno. The assets of the auto business consisted of automobiles, contracts from the sale of autos known as "buy
6 here pay here" and normal business assets. Since Mill Street closed, we are attempting to maximize the
7 liquidation of our assets to be able to pay the substantial Mill Street creditors that we have with amounts
8 currently due and owing.
9

10 4. The "buy here pay here" are the sale of autos to buyers who do not have the credit to finance the
11 vehicles from normal auto lending facilities. Therefore, the dealer sells the vehicles and retains the contracts
12 and collects on them. The default rate on these contracts is high and can be as high as 50%.

13 5. This requires knowledge of the business. It requires the repossession of the vehicles for non-
14 payment, which can be difficult if the buyer is uncooperative as is usually the case. It requires the
15 determination of whether the vehicle needs to be reconditioned before sale (and how much reconditioning). It
16 requires knowing where to sell the vehicle depending on the condition of the vehicle in order to get the
17 maximum value from the collateral. Thereafter, it usually requires chasing the buyer to obtain payment of the
18 deficiency between the contract amount and the amount obtained by the sale of the vehicle. These steps
19 require special knowledge and experience.
20

21 6. Presently Mill Street Auto has over \$300,000 in contracts. More that 25 of these contracts are
22 delinquent and more than 20 vehicles need to be repossessed, reconditioned, and sold.
23

24 7. Additionally, Mill Street Auto does not have any funds available to it to pay the utilities so that
25 our tenants at the Glendale property do not have the utilities they need to operate. See copies of outstanding
26 bills due attached as Exhibit "A" incorporated by reference.

27 8. Mill Street Auto, at its Sunshine Lane facility, does not have power to have access to the internet
28

1 which is the only location accessible to the cloud storage of Mill Street Auto's financial information.

2 9. If the court is not going to let Mill Street Auto handle its own contracts, then I would
3 recommend it have a knowledgeable industry profession do so.

4 The above information is true and correct to the best of my knowledge, and if called to testify, I could
5 and would testify to the truth of the matters asserted.
6

7
8 Dated: March _12_, 2020,

/s/John Woodley

John Woodley
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EXHIBIT A

EXHIBIT A

Fwd: Receipt for Invoice: [REDACTED] 68

Richard Taylor <rich@millstreetauto.com>

Thu 3/12/2020 8:53 AM

To: nathan@zlaw.com <nathan@zlaw.com>

DMS system that is paid monthly or it will be turned off

Rich

To track bhph pmts

Begin forwarded message:

From: Rafi Tizabi <Rafi.Tizabi@automanager.com>

Date: March 1, 2020 at 2:00:58 PM PST

To: Rich@millstreetauto.com

Subject: Receipt for Invoice: [REDACTED] 68

Dear Richard Taylor:

Your card number ending in 0361 for your AutoManager customer account **Mill Street Auto** (Client ID: [REDACTED] 82) was charged **\$80.00** on 03/01/2020 for services listed below.

If you have any questions, please contact your Account Representative Rafi Tizabi at (800) 300-2808 X 103.

Sincerely,
AutoManager, Inc.

Invoice# [REDACTED] 68

Date: 03/01/2020

Item	Description	Price	Qty	Total
HSMONTHLY	Hosting Subscription Renewal	\$8000	1	\$80.00
				Total: \$80.00
				Payment: \$80.00
				Total Due: \$0.00

Paid with: Visa ending in 0361

Fwd: Service Cancellation Notice

Richard Taylor <rich@millstreetauto.com>

Thu 3/12/2020 8:47 AM

To: nathan@zlaw.com <nathan@zlaw.com>

Begin forwarded message:

From: Waste Management <WM@notifications.wm.com>
Date: March 9, 2020 at 6:22:36 AM PDT
To: Rich@millstreetauto.com
Subject: Service Cancellation Notice
Reply-To: "WMCOLLECTIONSSOUTH4@WM.COM"
<WMCOLLECTIONSSOUTH4@WM.COM>

Waste Management

Welcome

Hello Reno Patio And Fireplace,

Please note that you are past due and have a closed account. Make a one-time payment of the total amount due or call us at [1-866-218-3220](tel:1-866-218-3220) so we can help you reinstate your service as quickly as possible. Suspension and/or resume charges* may apply.

MAKE A PAYMENT

We appreciate your attention to this matter and look forward to continue supporting your waste management needs.

Customer ID	[REDACTED] 8009
Current Charges	\$306.67
Total Amount Due	\$1190.18

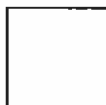
Service Address

Reno Patio And Fireplace
910 Glendale Ave
Sparks, NV 89431-5720
1-775-348-9600
rich@renopatio.com

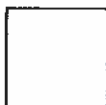
Billing Address

Reno Patio And Fireplace
910 GLENDALE AVE
SPARKS, NV 89431-5720
1-775-348-9600
rich@millstreetauto.com

5 Easy Ways To Pay

**Automatic Payment**

Set up recurring payments with us at
wm.com/myaccount.

**Pay Through Your Financial Institution**

Make a payment from your financial institution using your
Customer ID.

**One-Time Payment**

At your desk or on the go, use wm.com or our WM mobile app
for a quick and easy payment.

**Automated Pay by Phone**

Payable 24/7 using our automated system at
[1-866-964-2729](tel:1-866-964-2729).

**Mail It**

Write it, stuff it, stamp it, mail it.

* The Resume charge on your invoice is a one-time charge to cover the costs of reinstating services on your account.

When an account is placed on hold due to non-payment, and then later reinstated, we go through processes similar to when first setting up an account. The Resume charge represents the cost of this action.

We offer an automatic payment service which may be helpful in avoiding any future service interruptions. You can register for this feature on wm.com. If you are signed up for both automatic payments and paperless billing, the \$6.50 Administrative charge will be waived.

Download our mobile app.

Available on the
iPhone - App
Store

Android app on -
Google Play

Fwd: Waste Management Services Have Been Cancelled

Richard Taylor <rich@millstreetauto.com>

Thu 3/12/2020 8:44 AM

To: nathan@zlaw.com <nathan@zlaw.com>

Begin forwarded message:

From: Waste Management <WMCOLLECTIONSSOUTH4@WM.COM>

Date: March 5, 2020 at 4:24:34 PM PST

Subject: Waste Management Services Have Been Cancelled

Reply-To: <WMCOLLECTIONSSOUTH4@WM.COM>

[Waste Management - ThinkGreen](#)

[My Account](#) | [Customer Service](#)

Waste Management - Invoice Request

Our records indicate your service has been cancelled with our company and an outstanding balance is owed. We would like to work with you toward a resolution and avoid possible placement with a collection agency or an attorney.

Please contact or use a payment option below.

Customer Name:

RENO PATIO AND FIREPLACE

Customer ID:

[REDACTED] 3009

Service Address:

910 Glendale Ave

Sparks, NV 89431-5720

Payment Options

When calling, please reference your Customer ID in the subject line.

Submit
your
request
Pay online
www.WM.com

Submit
your
request
Contact us:
866-218-3220

Submit
your
request
Automated pay
by phone:
866-964-2729

You may also set up auto-pay at www.WM.com

If you are mailing a check, please call or reply to this email with check details.

Download our mobile app.

Available on the [Android app on -](#)
iPhone - App Store [Google Play](#)

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ThinkGreen

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